

Document Number CP 1.000

Revision Number 5

Revision Date 07/13/17

Code of Conduct

Page 1 of 9

1) Policy.

- a) Sharing Hope SC believes conscientious adherence to the highest ethical standards of behavior is essential for all directors and employees. Sharing Hope SC is charged with meeting critical public health needs by promoting and achieving donation of organs and tissues for transplantation and research. Sharing Hope SC has an obligation to donors, donor families, recipients, the transplant community, the community at large, directors, employees and partners to fulfill its mission in accordance with all applicable rules, regulations, and laws.
- b) Our Code of Conduct defines and supports the Core Values of Sharing Hope SC and those we serve. When
 questioning a course of action, we must ask for advice, reflect on the Core Values and ensure our decisions
 are in alignment.
 Our Code of Conduct provides important information about the expectations of Sharing Hope SC directors

and employees when conducting its business. It does not replace the policies or procedures of Sharing Hope SC, nor does it replace open and honest discussion, application of common sense, good judgment, or personal integrity

2) Definitions and/or Acronyms.

Term	Definition
Accountability	The acknowledgment and assumption of responsibility for one's actions and decisions, including
	the obligation to report, explain and be answerable for resulting consequences.
Compassion	The ability to recognize and the genuine desire to alleviate the distress or misfortune of others.
Core Values	Compassion, Integrity, Accountability, Excellence, Stewardship and Unity.
Director	All members of Sharing Hope SC's Board of Directors and Sharing Hope SC's Executive or
Director	Managing Directors.
EthicsPoint	The website used to file reports of suspected violations of the Code of Conduct.
E	The commitment of ourselves to continuously improve and seek to exceed recognized
Excellence	performance standards.
Integrity	Being honest and truthful with consistency of character.
Mission	The Sharing Hope SC Mission Statement: Together we inspire our community, offer hope and
Mission	change lives through the gift of organ, eye and tissue donation.
Ctowordobin	Honoring the giff by delivering a superior experience for all, sensing their needs and exceeding
Stewardship	their expectations.
Linity	A condition of organizational harmony encouraging teamwork, collaboration and celebration of
Unity	diversity

3) Scope and Responsibilities.

a) This document applies to all Directors and Employees of Sharing Hope SC.

Position	Responsibility
Directors and Employees	 Adhere strictly to these policies. No one at Sharing Hope SC, regardless of rank or position, may compromise adherence to these standards, either personally or by pressuring others to do so. Direct all questions regarding this policy or interpretation of the principles to a member of the Corporate Compliance Committee. Utilize EthicsPoint when they are aware of behavior violating the Code of Conduct, our Core Values or any rule, regulation, or law to which we are subject. Report retaliation against anyone filing an allegation. Ensure they have read and understand the procedure prior to performing the process.
Corporate Compliance Committee	 Address questions and advise directors and employees on all issues arising from interpretations of the principles or information contained in this policy. Ensure directors and employees are properly trained prior to being released to task and as updates occur.



Document Number CP 1.000

Revision Number 5

Revision Date 07/13/17

Code of Conduct

Page 2 of 9

4) Materials and/or Equipment.

a) Not applicable.

5) Procedure.

 a) Our Code of Conduct contains 9 general principles affirming our policy and standards intended to provide additional guidance to Sharing Hope SC's directors and employees. These principles are neither exclusive nor complete.

Responsible Person	Step	Action
Directors and Employees	1	Principle 1: Business and Behavioral Ethics. Sharing Hope SC is committed to the highest standards of business ethics and integrity. Directors and employees will accurately and honestly represent Sharing Hope SC and will not engage in any activity or scheme intended to defraud anyone of money, property, services or self-respect. Employees should exercise good judgment and act in a mature and responsible manner at all times. An employee's conduct not only affects themselves, but also Sharing Hope SC, their co-workers, our partners and the community. • Commitment to the Mission: Core Value: All. Sharing Hope SC requires all directors and employees to utilize the core values and the vision statement of the organization to accomplish the mission. These tools are to be used to choose the ethical behavior required to enrich business relationships, further donor and recipient family encounters, strengthen our partnerships and develop organizational unity. • Respectful Behavior: Core Value: Compassion. Sharing Hope SC directors and employees are expected to conduct themselves at all times in a manner of respect for others and self. Choosing effective and productive behavior based on the needs of others versus self is imperative to accomplishing our mission. Your behavior should show you value other people's diversity, perspectives, time and space. • Honest Communication: Core Value: Integrity. Sharing Hope SC requires candor and honesty from directors and employees in the performance of their responsibilities. No employee shall make false or misleading statements while conducting business or representing Sharing Hope SC. • Misappropriation of Proprietary Information: Core Value: Stewardship. Sharing Hope SC directors and employees shall not misappropriate confidential or proprietary information belonging to another person or entity. Nor shall you utilize any publication, document, computer program, information or product in violation of a third-party's interest in such product. All Sharing Hope SC directors and e
		Principle 2: Legal Compliance Sharing Hope SC will strive to ensure all activity by or on behalf of the organization is in compliance with applicable rules, regulations and laws.
Directors and Employees	2	 Antitrust: Core Value: Integrity. All directors and employees must comply with applicable antitrust and similar laws regulating competition. Examples of conduct prohibited by the laws include: agreements to fix prices, bid rigging, collusion (including price sharing) with competitors. boycotts, certain exclusive dealing and price discrimination agreements.



Document Number CP 1.000 Revision Number 5 07/13/17 **Revision Date**

Code of Conduct

Page 3 of 9

		 unfair trade practices, including bribery, misappropriation of trade secrets,
		deception, intimidation and similar unfair practices.
		Fraud and Abuse: Core Value: Integrity. Sharing Hope SC expects its
		directors and employees to refrain from conduct violating fraud and abuse laws.
		These laws prohibit:
		 direct, indirect or disguised payments in exchange for referral of patients.
		 submission of false, fraudulent or misleading claims to any government entity
		or third-party payer.
		false representation to any person or entity in order to gain or retain
		participation in a program or payment for any service.
		Lobbying/Political Activity: Core Value: Accountability. The Internal Payague Code limits the direct political activities. Sharing them a SC. Sharing.
		Revenue Code limits the direct political activities of Sharing Hope SC. Sharing
		Hope SC expects each of its directors and employees to refrain from engaging
		in activities jeopardizing the tax exempt status of the organization, including a
		variety of lobbying and political activities. o No individual may make any agreement to contribute any money, property or
		service of any director or employee on behalf of Sharing Hope SC to any
		political candidate, party, organization, committee or individual in violation of
		any applicable law. Directors and employees may personally participate in,
		and contribute to, political organizations or campaigns, but they must do so
Directors and	2	as individuals, not as representatives of Sharing Hope SC, and they must
Employees	_	use their own funds.
2		Sharing Hope SC may publicly offer recommendations concerning legislation
		or regulations being considered. In addition, it may analyze and take public
		positions on issues relating to Sharing Hope SC operations when Sharing
		Hope SC's experience contributes to the understanding of such issues.
		 Sharing Hope SC has many contacts and dealings with governmental bodies
		and officials. All such contacts and transactions shall be conducted in an
		honest and ethical manner. Any attempt to influence the decision-making
		process of governmental bodies or officials by an improper offer of any
		benefit is absolutely prohibited.
		Environmental: Core Value: Accountability. It is the policy of Sharing Hope
		SC to manage and operate its business in a manner which respects our
		environment and conserves natural resources. Sharing Hope SC directors and
		employees will strive to utilize resources appropriately and efficiently, to recycle
		where possible, to dispose of all waste in accordance with applicable laws and
		regulations and to work cooperatively with the appropriate authorities to remedy
		any environmental contamination for which Sharing Hope SC may be
		responsible. Sharing Hope SC is committed to safe and responsible disposal of
		biohazardous waste and utilizes a medical waste tracking system for the proper
		disposal of infectious and physically dangerous medical or biological waste in
		accordance with S 8.000 Packaging, Release and Tracking of Biohazardous Waste.
		 Discrimination and Harassment: Core Value: Unity. The source of our
		success at Sharing Hope SC is our people. Sharing Hope SC believes the fair
		and equitable treatment of directors, employees, patients, donor families and
		other persons is critical to fulfilling its mission. Sharing Hope SC serves these
		individuals without regard to race, color, religion, sex, ethnic origin, age,
		disability or any other protected classes by law. Sharing Hope SC is an Equal
		Opportunity Employer. Discrimination and/or harassment on the basis of any of
		the aforementioned classifications prohibited by law will not be permitted. Each
		allogation of discrimination or baroament will be promptly investigated in

allegation of discrimination or harassment will be promptly investigated in accordance with **CP 2.000 Program Description and Administration**. All



Document Number CP 1.000

Revision Number 5

Revision Date 07/13/17

Page 4 of 9

Code of Conduct

Directors and Employees	2	directors and employees must treat one another in a fair and respectful manner. All directors and employees shall strive to create an environment where concerns about conduct and behavior can be raised and openly discussed without fear of retribution or retaliation.
		Principle 3: Confidentiality.
Directors and Employees	3	Sharing Hope SC directors, employees and partners shall maintain the confidentiality of all patient and proprietary information in accordance with applicable legal and ethical standards both during and after affiliation with Sharing Hope SC. • Donor, Donor Family, and Recipient Information: Core Value: Stewardship. Sharing Hope SC directors, employees and partners have access to sensitive, privileged information about donors, donor families and recipients. Families properly expect this information will be kept confidential to the extent permitted by law. Sharing Hope SC takes any violation or confidentiality very seriously. Discussion of a donor's or recipients medical condition, family situation, or providing any information to anyone other than Sharing Hope SC personnel and other authorized persons wito require the information is not permitted. Sharing Hope SC owns the records documenting each donation. Records are confidential and will not be reviewed, except as required for the performance of one's duties or by court order. Donor records will not be altered, or destroyed and only with proper authorization will donor records be relocated to Sharing Hope SC's off-site storage facility. Directors and employees having access to records must proserve their confidentiality and integrity. • Sharing Hope SC's Proprietary Information: Core Value: Accountability. Information, ideas, and intellectual property assets of Sharing Hope SC are important to organizational success. Information pertaining to Sharing Hope SC's competitive position, business strategies, financial information, research data, and information relating to negotiations with directors, employees or third parties (to include hospitals and their staff) must be protected and shared with directors and employees as required for performance of their job responsibilities. Sharing Hope SC may participate in and receive the results of industry related surveys. Directors and employees will exercise care to ensure intellectual property rights, including paten

electronic data. Computer passwords must always be kept confidential.



Document Number CP 1.000

Revision Number 5

Revision Date 07/13/17

Code of Conduct

Principle 4: Conflicts of Interest

Page 5 of 9

Directors and employees owe a duty of undivided and unqualified loyalty to Sharing Hope SC. These individuals may not use their positions to profit personally or to assist others in profiting at the expense of Sharing Hope SC. Adherence to this principle ensures directors and employees act with total objectivity in carrying out their responsibilities for Sharing Hope SC.

Outside Financial Interests: Core Value: Integrity

- Ownership in or employment with any entity conducting business with Sharing Hope SC must be approved through completion of *CP 2.000-3 Conflict of Interest Disclosure Statement*. This does not apply to stock or other investments in a publicly-held corporation, provided the value of the stock or other investments does not exceed five percent (5%) of the corporation's total stock.
- Conducting personal business with any vendor, supplier, contractor or agency of Sharing Hope SC that would impact or be detrimental to Sharing Hope SC's continued operations.
- Representation of Sharing Hope SC by a director or employee in any transaction in which he or she or a household member has a substantial personal interest.
- Providing a personal guarantee, on behalf of Sharing Hope SC in exchange for goods or services in any manner.
- Disclosure or use of confidential, special or inside information of, or about, Sharing Hope SC for personal profit or advantage of a director, employee or a family member as defined in *HR 7.217 Family Relationships and* Fraternization.
- Providing goods or services substantially similar to those provided by, or which may in the future be provided by, Sharing Hope SC.
- Having outside employment or business interests that place them in the position of lessening their efficiency, productivity, or dedication to Sharing Hope SC in the performance of their duties.
- Competition with Sharing Hope SC by a director or employee, directly or indirectly, in the purchase, sale or ownership of property, property rights, property interests or business investment opportunities.
- Services for Competitors/Vendors: Core Value: Integrity. Except for members of Sharing Hope SC's Board of Directors, no employee shall perform work or render services for any existing or prospective competitor, organization or business associated with Sharing Hope SC without approval through completion of CP 2.000-3 Conflict of Interest Disclosure Statement. Use of an employee's name in any fashion indicating a business connection with such organization must be approved through completion of CP 2.000-3 Conflict of Interest Disclosure Statement.
- Participation on Outside Board of Directors/Trustees: Core Value:
 Integrity. Prior to seeking or accepting an appointment with any organization whose interest may conflict with those of Sharing Hope SC, a director or employee must obtain approval by completing CP 2.000-3 Conflict of Interest Disclosure Statement.
- Medicare Intermediary's or Carriers: Core Value: Integrity. In order for Sharing Hope SC to comply with requirements of the Medicare program, every employee must disclose if they were, at any time during the year preceding employment with Sharing Hope SC, employed by a Medicare intermediary or carrier. An employee's failure to make this disclosure at the time of employment could cause Sharing Hope SC to lose its right to participate in Medicare.

Directors and Employees 4



Document Number CP 1.000

Revision Number 5

Revision Date 07/13/17

Code of Conduct

Page 6 of 9

Directors and	4	Annual Disclosure Statement: Core Value: Accountability. The CP 2.000-3
Employees		
		Principle 5: Business Relationships.
Directors and Employees	5	Conflict of Interest Disclosure Statement will be updated annually or more often, should any of the above situations apply.
		sessions is permitted. Attendance, at vendor's expense, at out of-town seminars, workshops and training sessions is permitted only with the approval
1		of an employee's supervisor and the Chief Executive Officer.
		Business Inducements: Core Value: Integrity. Sharing Hope SC directors
		and employees shall not seek to gain any advantage through the improper use of payments, business courtesies or other inducements. Offering, giving, soliciting or receiving any form of bribe or other improper payment is prohibited.
		soliciting or receiving any form of bribe or other improper payment is prohibited.
		Appropriate commissions, rebates, discounts and allowances are customary
		and acceptable business inducements; provided they are approved by Sharing Hope SC management and they do not constitute illegal or unethical payments.
		Any such payments must be reasonable in value, competitively justified,
		Any such payments must be reasonable in value, competitively justified,



Document Number CP 1.000

Revision Number 5

Revision Date 07/13/17

Code of Conduct

Page 7 of 9

Directors and Employees	5	properly documented and made to the business entity to which the original agreement or invoice was made or issued. Such payments should not be made to individual directors, employees or agents of business entities. In addition, directors and employees may provide gifts, entertainment and meals of nominal value to Sharing Hope SC customers, current and prospective business partners and other persons when such activities have a legitimate business purpose, are reasonable and consistent with all applicable laws and are consistent with Sharing Hope SC administrative or departmental policies and procedures.
Directors and Employees	6	 Principle 6: Protection of Assets. All directors and employees will strive to preserve and protect Sharing Hope SC's assets by making prudent and effective use of its resources and properly and accurately reporting its financial condition. Internal Controls: Core Value: Accountability. Sharing Hope SC has established control standards and procedures to ensure assets are protected and properly used and financial records and reports are accurate and reliable. All directors and employees of Sharing Hope SC share the responsibility for maintaining and complying with required internal controls. Financial Reporting: Core Value: Accountability. All financial reports, accounting records, research reports, expense accounts, time sheets and other documents must accurately and clearly represent the relevant facts or the true nature of a transaction, Improper or fraudulent accounting, documentation, or financial reporting is contrary to the policy of Sharing Hope SC and may be in violation of applicable laws. Travel and Entertainment: Core Value: Accountability. Travel and entertainment expenses should be consistent with the employee's job responsibility and the organization's needs and resources. It is Sharing Hope SC's policy that an employee should not suffer a financial loss or a financial gain as a result of business travel and entertainment. Directors and employees are expected to exercise reasonable judgment in the use of Sharing Hope SC's assets and to spend the organization's assets as carefully as they would spend their own. Personal Use of Corporate Assets: Core Value: Accountability. All Directors and employees are expected to refrain from converting assets of the organization to personal use. All property and business of the organization shall be conducted in the manner designed to further Sharing Hope SC's interest rather than the personal interest of an individual. Directors and employees are prohibited from the unauthorized use or
Directors and Employees	7	As a not-for-profit organization serving a charitable purposes, Sharing Hope SC holds a federal tax-exempt status under section 501(c)(3) of the Internal Revenue Code. Sharing Hope SC does not pay income taxes on revenues derived from our charitable purpose. Retaining the tax exempt status is a requirement for Sharing Hope SC to operate as an Organ and Tissue Procurement Organization. The following are key requirements for maintaining tax exempt status. • Private Inurement: Core Value: Integrity. As a 501(c)(3) organization, Sharing Hope SC is prohibited from engaging in activities that result in "inurement" of its assets or earnings to insiders, that is, individuals whose special relationship offers them an opportunity to benefit economically from the organization's



Document Number CP 1.000

Revision Number 5

Revision Date 07/13/17

Code of Conduct

Page 8 of 9

Directors and Employees	7	income or assets. In this context, the IRS has broadly interpreted the term "insiders" to include Sharing Hope SC's directors and executives. • Private Benefit: Core Value: Integrity. In contrast to the prohibition on private inurement, which only applies to insiders, the private benefit restriction applies to all individuals, regardless of their relationship to Sharing Hope SC. The private benefit limit requires Sharing Hope SC to serve public rather than private interests. • Intermediate Sanctions: Core Value: Integrity. Many situations raise concerns about private inurement or private benefit are also likely to create a tax liability under the "intermediate sanctions" rules. Intermediate sanctions allow the IRS to assess penalty taxes when certain individuals or entities, referred to as "disqualified persons," receive "excess benefits" from an exempt organization like Sharing Hope SC. A "disqualified person" is defined as any person or entity in a position to exercise substantial influence over an organization. Sharing Hope SC's directors and executives, as well as the five highest-paid employees, are likely to be considered disqualified persons. • Unrelated Business Income Tax (UBIT): Core Value: Accountability. As a section 501(c)(3) organization, Sharing Hope SC will generally be exempt from federal income tax. Sharing Hope SC will be taxed on income received from unrelated trade or business transactions. Any activity performed by Sharing Hope SC not substantially relating to its exempt purpose can produce UBTI. • Charitable Donations. Core Value: Accountability. For all gifts of \$250 or more, Sharing Hope SC is obligated to provide the contributor written acknowledgment to confirm no goods or services were provided to the donor in exchange for their gift. In the event the donor did receive a benefit from their gift, Sharing Hope SC will indicate what portion of the gift a donor may take as a charitable deduction.
Directors and Employees	8	Principle 8: Regulations, Licensure and Accreditation: Core Value: Excellence. Sharing Hope SC operates in a highly regulated field and must monitor compliance within a great variety of highly-complex regulatory requirements. Sharing Hope SC requires the cooperation of directors, employees and partners in complying with these regulations and bringing non-compliance or violations to light. While the oversight requirements may not always carry criminal penalties, they affect the licenses and certifications that allow us to deliver the best possible service to donors, donor families, recipients, business partners, and the community at large. Our continued ability to operate depends upon each employee's attention to regulatory compliance. Principle 9: Adherence to Sharing Hope SC's Policies and Procedures: Core Value: Accountability.
Directors and Employees	9	Employees shall strive to adhere to all of Sharing Hope SC's policies and procedures as authorized by Sharing Hope SC's Board of Directors or executives. All employees are provided access to the electronic database housing the complete collection of all policies and procedures.

6) Attachments.

a) Not Applicable.

7) Referenced and Related Procedures.

- a) CP 2.000 Program Description and Administration.
- b) HR 7.217 Family Relationships and Fraternization.
- c) Q 1.000 Sharing Hope SC's Quality Systems and Philosophy.
- d) Q 23.000 Managing Records.



CP 1.000
5
07/13/17

Code of Conduct

Page 9 of 9

e) S 8.000 Packaging, Release and Tracking of Biohazardous Waste.

8) Standards and Regulations.

- a) ADA Amendments Act of 2008 § 12101 Findings and purpose.
- b) Anti-Kickback Act 42 U.S.C. § 1320a-7b. Criminal penalties for acts involving Federal health care programs.
- c) Association of Organ Procurement Organizations (AOPO) Administrative Standard (AS11, AS 11.1, AS 11.2, AS 11.2.1, AS 11.2.2, AS 11.2.3, and AS 11.3).
- d) Centers for Medicare and Medicaid Services (CMS) 42 code of federal Regulations (CFR) § 486 Medicare and Medicaid Programs; Conditions for Coverage for Organ Procurement Organization (OPO's); Final Rule.
- e) 42 U.S.C § 1320a-7b. Criminal penalties for acts involving Federal health care programs.
- f) 31 U.S.C. § 3729(a)). False claims.
- g) 42 U.S.C. § 1320a-7a. Civil monetary penalties.
- h) Civil Rights Act of 1964, Public Law 88-352.
- i) Internal Revenue Code Section 501(c)(3).
- j) National Organ Transplant Act, Public Law 98-507.
- k) South Carolina Code of Laws, Title 44 Health, Chapter 43:
 - i) Article 5, Uniform Anatomical Gift Act.
 - ii) Article 6, Uniform Determination of Death Act.
- I) Social Security Act, Title XVIII Health Insurance for the Aged and Disabled (42 U.S.C §1395 et seq.).

Uncontrolled copy unless watermarked in red as "Controlled Copy."